## MEMO ENDORSE

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February 17, 2022

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BY ECF

James Kousouros

The Honorable Nelson S. Román United States District Judge Southern District of New York 300 Quarropas St. White Plains, NY 10601-4150

> Re: United States v. Marcus Chambers, 20 Cr. 572 (NSR)

Dear Judge Román,

This letter is respectfully submitted to request an additional 14-days to file a response to the initial Presentence Report on behalf of Mr. Chambers.

Per the Docket Text filed with the initial Presentence Report, D.E. 52, responses to the initial Presentence Report must be emailed to the Probation Officer of record within 14 days.

Given the restriction on visits at the MDC, Brooklyn due to COVID-19 and then the national BOP lockdown due to the incident in Texas we have been unable to meet with Mr. Chambers to discuss the initial Presentence Report and any response.

We have now been informed legal visits at the MDC have resumed and will meet with Mr. Chambers to review the initial Presentence Report. Thus, we request an additional 14-days to submit any response. We have spoken with Probation Officer Nichole Brown-Morin who has no objection to the instant request and who informs us that the requested extension will not delay the final report which is to be submitted to the Court by March 11, 2022.

The Government have no objection to this request.

Thank you for your courtesy and consideration.

Respectfully submitted,
/s/
James Kousouros, Esq.

c.c.

Christopher Brumwell

Olga Zverovich Assistant United States Attorneys

Nichole Brown-Morin United States Probation Officer

Defendant Marcus Chambers's request for an extension is GRANTED. Defendant shall have an additional 14 days to file a response to the initial Presentence Report. The Clerk of Court is kindly directed to terminate the motion at ECF No. 53.

DATED: February 18, 2022

White Plains, NY

SO ORDERED:

HON, NELSON S. ROMAN UNITED STATES DISTRICT JUDGE